

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
<hr/>		Related to Dkt. No. 5250

**THE DETROIT RETIREMENT SYSTEMS’ RESPONSE TO MOTION OF  
THE CITY OF DETROIT FOR SITE VISIT BY COURT IN  
CONNECTION WITH THE HEARING ON CONFIRMATION  
OF THE CITY’S PLAN OF ADJUSTMENT**

The Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit (together, the “Retirement Systems”) respond to the Motion of the City of Detroit for Site Visit by Court in Connection with the Hearing on Confirmation of the City’s Plan of Adjustment [Dkt. No. 5250] (the “Site Visit Motion”) as follows:

**Limited Response**

1. The Proposed Protocol for Site Visit (the “Site Visit Protocol”) attached as 6B to the Site Visit Motion provides, in relevant part: “Counsel for the Debtor and counsel for the Objectors (the “Site Visit Counsel”) shall be permitted to participate in the Site Visit.”

2. Footnote 3 of the Site Visit Protocol provides:

Counsel for the Objectors shall consist of one attorney per Objector. For purposes of this Order, “Objectors” shall mean and include Financial Guaranty Insurance Company, Syncora Guarantee Inc., National Public Finance Guarantee Corporation, Assured Guaranty Municipal Corp., the Trustee for the Detroit Water and Sewerage Department (“DWSD”) Bondholders, the Ad Hoc Committee of DWSD Bondholders, a representative of the COPs Holders, the non-settling Public Safety Unions, and any retiree association or retirement system that, after conclusion of balloting, becomes an objecting party.

3. The Site Visit Protocol appears to exclude representatives of the Retirement Systems from participating in the Site Visit unless, after the conclusion of balloting, they become an objecting party.

4. The Retirement Systems submit that, if the Court grants the Site Visit Motion, their representatives should be allowed to participate in the Site Visit, regardless of whether they will be supporting or objecting to the Plan.<sup>1</sup>

5. Accordingly, the Retirement Systems request that the Site Visit Protocol be modified to make it clear that representatives from each Retirement System are unconditionally authorized to participate in the Site Visit.

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<sup>1</sup> The Site Visit Protocol limits Site Visit Counsel to one attorney per Objector, which counsel for the Debtor may include up to three attorneys. The Retirement Systems submit that each party participating in the Site Visit should be authorized to include more than one attorney because each party will have more than one attorney representing it at the confirmation hearing.

Respectfully submitted,

CLARK HILL PLC

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Dated: June 17, 2014

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Retirement System of the City of Detroit*

# EXHIBIT 1

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		Related to Doc. No. 4392

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 17, 2014, The Detroit Retirement Systems' Response to Motion of the City of Detroit for Site Visit by Court in Connection with the Hearing on Confirmation of the City's Plan of Adjustment was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

CLARK HILL PLC

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